

**BEFORE THE JUDICIAL PANEL ON MULTI-DISTRICT  
LITIGATION**

In re: AMERIQUEST MORTGAGE CO.     )  
MORTGAGE LENDING PRACTICES     )  
LITIGATION     )     MDL Docket No. 1715  
   )

**NOTICE OF POTENTIAL TAG-ALONG ACTIONS**

PLEASE TAKE NOTICE that, pursuant to J.P.M.L. Rules 7.2(i) and 7.5(e), the undersigned counsel for the plaintiffs gives notice of the following potential tag-along actions:

1.     *Curtis Rackley, et al. v. Ameriquest Mortgage Company, Inc.* Case No. 1:07-cv-00748-CG-M (Southern District of

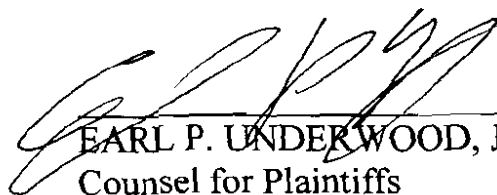
Alabama, Southern Division) Judge Callie V. S. Granade, presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit A.

2. *Joyce Williams v. Ameriquest Mortgage Company, Inc.*  
Case No. 1:07-cv-00753-KD-C (Southern District of Alabama, Southern Division) Judge Kristi K. DuBose, presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit B.

Plaintiffs in this Tag-along Action are plaintiffs in the putative national class actions transferred by the Panel to the Northern District of Illinois for consolidated and coordinated pretrial proceedings (the “Borrowers’ Consolidated Class). These Tag-along Actions allege the same general conduct, claim the same injury and seek the same relief as the Borrowers’ Consolidated Class Action. Likewise, these Tag-along Actions rely upon the same legal theories, require the same or similar factual determinations, and are governed by the same law.

Therefore, the Plaintiffs respectfully request that the Panel transfer this Tag-along Action to the Northern District of Illinois pursuant to J.P.M.L. Rule 7.4.

Respectfully Submitted this 24<sup>th</sup> day of October, 2007.



EARL P. UNDERWOOD, JR.

Counsel for Plaintiffs

Law Offices of Earl P. Underwood, Jr

Post Office Box 969

Fairhope, AL 36533-0969

251-990-5558 (T)

251-990-0626 (F)

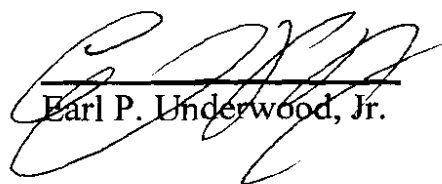
[epunderwood@alalaw.com](mailto:epunderwood@alalaw.com)

CERTIFICATE OF SERVICE

I hereby certify that on this the 24<sup>th</sup> day of October, 2007, a copy of the foregoing was served on counsel for all parties to this proceeding by placing a copy of same in the U.S. Mail, properly addressed and first-class postage prepaid to:

Kenneth J. Riemer  
Attorney at Law  
P.O. Box 1206  
166 Government St.  
Mobile AL 36633

Stephen J. Bumgarner  
Burr & Forman LLP  
3400 Wachovia Tower  
420 North 20th St.  
Birmingham AL 35203



Earl P. Underwood, Jr.